

Exhibit D

Budget and Staffing Plan

Budget and Staffing Plan

(For Matter Categories for the Period Beginning on February 14, 2025 and Ending June 13, 2025)

Budget

Matter Number	Project Category Description	Hours Budgeted	Total Compensation Budgeted
2	Adversary Proceeding and Contested Matters	7,055 - 7,577	\$10,867,500 - \$11,672,500
3	Corporate, Securities, and Governance Matters	163 - 175	\$270,000 - \$290,000
4	Disclosure Statement/Plan/Confirmation	5,256 - 5,646	\$8,100,000 - \$8,700,000
5	DIP Financing and Cash Collateral	390 - 419	\$675,000 - \$725,000
6	Cash Management	135 - 145	\$270,000 - \$290,000
7	Automatic Stay Issues	505 - 543	\$810,000 - \$870,000
8	Asset Sales/Section 363/Use, Sale, and Disposition of Property	504 - 541	\$945,000 - \$1,015,000
9	Executory Contracts and Unexpired Leases	468 - 502	\$877,500 - \$942,500
10	Business Operations	18 - 19	\$33,750 - \$36,250
11	Claims Administration	142 - 153	\$270,000 - \$290,000
12	Schedules and Statements (SOFAs)	18 - 19	\$33,750 - \$36,250
13	Creditor and Stakeholder Communications	69 - 75	\$135,000 - \$145,000
14	U.S. Trustee Matters and Communications	70 - 75	\$135,000 - \$145,000
15	Hearings	175 - 188	\$270,000 - \$290,000
16	Insurance and Surety Matters	72 - 78	\$135,000 - \$145,000
17	Utilities	68 - 73	\$135,000 - \$145,000
18	Tax Matters	66 - 71	\$135,000 - \$145,000
19	Case Administration	100 - 107	\$135,000 - \$145,000
20	Retention – K&E	438 - 471	\$810,000 - \$870,000
21	Retention – Non-K&E	300 - 322	\$607,500 - \$652,500
22	Vendor Matters	338 - 363	\$675,000 - \$725,000
23	Litigation	104 - 111	\$135,000 - \$145,000
24	Non-Working Travel	133 - 143	\$135,000 - \$145,000
25	Creditors' Committee Matters	138 - 148	\$270,000 - \$290,000
26	Employee and Labor Matters	69 - 74	\$135,000 - \$145,000

Total		16,794 - 18,038	\$27,000,000 - \$29,000,000
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Staffing Plan

Category of Timekeeper	Number of Timekeepers Expected to Work on the Matter Categories During the Budget Period	Average Hourly Rate¹
Partner	19	\$2,208
Associate	40	\$1,161
Paralegal	2	\$495
Junior Paralegal	3	\$395
Total	64	\$1,615

¹ The Average Hourly Rate is a weighted average based on the individual hourly rate of, and projected number of hours worked by, each timekeeper over the course of the chapter 11 cases.